

John S. Persell (OSB # 084400)
Oregon Wild
5825 N Greeley Avenue
Portland, OR 97217
Tel: (503) 896-6472
jp@oregonwild.org

Meriel L. Darzen (OSB # 113645)
Crag Law Center
3141 E Burnside Street
Portland, OR 97214
Tel: (503) 525-2725
Fax: (503) 296-5454
meriel@crag.org

Attorneys for Plaintiff

Todd Kim, Assistant Attorney General
U.S. Department of Justice
Environment and Natural Resources Division

Krystal-Rose Perez (TX Bar # 24105931)
Trial Attorney
Natural Resources Section
150 M Street NE
Washington, DC 20002
Tel: (202) 305-0486
krystal-rose.perez@usdoj.gov

Attorneys for Federal Defendant

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
PORTLAND DIVISION

OREGON WILD,

Case No.: 3:23-cv-00935-SB

Plaintiff,

**JOINT MOTION FOR A STAY
OF PROCEEDINGS**

v.

UNITED STATES FOREST SERVICE,

Defendant.

The Parties respectfully request the Court stay this matter under its “discretionary power” to stay proceedings. *Lockyer v. Mirant Corp.*, 398 F.3d 1098, 1109 (9th Cir. 2005). In support of this Joint Motion the Parties state the following:

1. The Parties are engaging in settlement discussions to determine whether they can resolve this case without the need for protracted litigation and further involvement of the Court.
2. The Parties require more time to continue these discussions.
3. If the Parties are able to reach a tentative proposed agreement for a recommended settlement, the agreement will require review and approval by the appropriate officials within the United States Department of Agriculture and the United States Department of Justice before any settlement could be finalized.
4. Based on the foregoing, the Parties respectfully request that the Court issue a stay of proceedings in this matter.
5. The Parties propose to file a Joint Status Report by June 14, 2024 (30 days from the filing of this Joint Motion), providing a status update and proposing any future actions in this case as may be appropriate, including dismissal of this action.
6. The Parties submit that this request will not prejudice any party and will help foster judicial economy in the event that they are successful in resolving the case through settlement.

For these reasons, the Parties respectfully request that the Court grant this Joint Motion and stay the proceedings in this matter to allow the Parties an opportunity to negotiate a settlement.

Respectfully submitted this 14th day of May, 2024.

/s/ John Persell (with permission)

John S. Persell
Oregon Wild
5825 N Greeley Ave
Portland, OR 97217
(503) 896-6472
jp@oregonwild.org

Meriel Darzen
Crag Law Center
3141 E Burnside St
Portland, OR 97214
(503) 525-2725
meriel@crag.org

Attorneys for Plaintiff

Todd Kim, Assistant Attorney General
U.S. Department of Justice
Environment and Natural Resources Division

/s/ Krystal-Rose Perez

Krystal-Rose Perez, Trial Attorney
Natural Resources Section
150 M Street, NE
Washington, DC 20002
(202) 305-0486
krystal-rose.perez@usdoj.gov

Attorneys for Federal Defendant